

ORIGINAL

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

①

2016 MAR 22 PM 1:46

CLERK OF COURT  
WC

INVOICED  
ROSE ADANMA DURU  
Plaintiff

4-16CV-213-0

Civil Action No.

v.

DR ROBERT SCHREINER, ET AL;  
Defendant

COMPLAINT

DEFENDANTS:

- ① DR ROBERT SCHREINER OF HURON  
CONSULTING GROUP, DALLAS, TEXAS  
500 N. AKARD STREET,  
STE. 1940,  
DALLAS, TEXAS 75201.
- ② HURON CONSULTING GROUP,  
500 N. AKARD STREET,  
STE. 1940,  
DALLAS, TEXAS 75201.

\* Attach additional pages as needed.

Date MARCH 21, 2016  
Signature Rose Duru  
Print Name ROSE ADANMA DURU  
Address 1822 YOUNG STREET,  
City, State, Zip DALLAS, TEXAS 75201.  
Telephone N/A

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

(2)

ROSE ADANMA DURU  
Plaintiff

v.

Civil Action No. \_\_\_\_\_

DR ROBERT SCARLEINER ET AL;  
Defendant

COMPLAINT

DEFENDANTS - CONT.

(3)

JANA S. BAKER;  
TEXAS BAR NO. 00794610.  
PRESTON COMMONS, SUITE 500  
8117 PRESTON ROAD,  
DALLAS, TEXAS 75225.

(4)

HEIDI H. HARRISON;  
TEXAS BAR NO. 24074370.  
PRESTON COMMONS, SUITE 500,  
8117 PRESTON ROAD,  
DALLAS, TEXAS 75225.

\* Attach additional pages as needed.

Date

MARCH 21, 2016

Signature

Rose Duru

Print Name

ROSE ADANMA DURU

Address

1822 YOUNG STREET,

City, State, Zip

DALLAS, TEXAS 75201.

Telephone

N/A

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

3

ROSE ADANMA DURU  
Plaintiff

v.

Civil Action No. \_\_\_\_\_

DR ROBERT SCHREINER, ET AL;  
Defendant

COMPLAINT

DEFENDANTS - CONT:

⑤ OGLETREE, DRAKINS, NASH, SMOAK  
& STEWART, P.C.  
PRESTON COMMONS, SUITE 500,  
8117 PRESTON ROAD,  
DALLAS, TEXAS 75225.

\* Attach additional pages as needed.

Date

MARCH 21, 2016.

Signature

Rose Duru.

Print Name

ROSE ADANMA DURU.

Address

1822 YOUNG STREET,

City, State, Zip

DALLAS, TEXAS 75201.

Telephone

N/A

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

(H)

ROSE ADANIMA DURU  
Plaintiff

v.

Civil Action No. \_\_\_\_\_

DR ROBERT SCHREINER, ET AL;  
Defendant

COMPLAINT

- ① PERJURY; ② IMPERSONATION;
- ③ CONSPIRACY TO COMMIT PERJURY;
- ④ OBSTRUCTION OF JUSTICE;
- ⑤ EVADING PROSECUTION;
- ⑥ CRIMINAL TRESPASSING;
- ⑦ UNLAWFUL BREAKING AND ENTRY;
- ⑧ CRIMINAL NEGLIGENCE;
- ⑨ INVASION OF PRIVACY;
- ⑩ LAWYER DISCIPLINE; ⑪ DECEIT;

\* Attach additional pages as needed.

Date MARCH 21, 2016  
Signature Rose Duru  
Print Name ROSE ADANIMA DURU  
Address 1822 YOUNG STREET,  
City, State, Zip DALLAS TEXAS 75201.  
Telephone N/A

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

(5)

Rose Adanna Duru  
Plaintiff

v.

Civil Action No. \_\_\_\_\_

Dr Robert Schreiner, et al,  
Defendant

COMPLAINT

- ⑫ DEPRIVED INDIFFERENCE; COVER UP;
- ⑬ THEFT; ⑭ FRAUD;
- ⑮ CONSPIRACY TO COMMIT FRAUD;
- ⑯ GROSS PROFESSIONAL NEGLIGENCE;
- ⑰ MISREPRESENTATION;
- ⑱ CYBER ATTACKS / STALKING;
- ⑲ INTENTIONAL, AND MALICIOUS INFLECTION OF PAIN; ACCESSORY AFTER THE FACT;
- ⑳ SEXUAL HARASSMENT, AND ASSULT -

\* Attach additional pages as needed.

THEFT OF PLAINTIFF'S PANTIES;  
⑳ COVER UP;

Date MARCH 21, 2016  
Signature Rose Duru  
Print Name ROSE ADANNA DURU  
Address 1822 YOUNG STREET,  
City, State, Zip DALLAS, TEXAS 75201.  
Telephone N/A

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

6

ROSE ADANMA DURU  
Plaintiff

v.

Civil Action No. \_\_\_\_\_

DR ROBERT SCHREINER ET AL;  
Defendant

COMPLAINT

① DEFENDANT- DR ROBERT SCHREINER;  
PERJURY; IMPERSONATION OF FORMER  
CO-WORKER- DR REED PITRE; FRAUD;  
THEFT; CRIMINAL TRESPASSING;  
EVADING PROSECUTION; STALKING;  
CYBER ATTACKS; SEXUAL HARASSMENT,  
AND ASSULT- STEALING PLAINTIFF'S PANTIES;  
STEALING COURT DOCUMENTS; UNLAWFUL  
ENTRY INTO PLAINTIFF'S PRIVATE RESIDENCE;

\* Attach additional pages as needed.

CONT.

Date MARCH 21, 2016.  
Signature Rose Duru  
Print Name ROSE ADANMA DURU.  
Address 1822 YOUNG STREET,  
City, State, Zip DALLAS, TEXAS 75201.  
Telephone N/A

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS**

⑦

ROSE ADANIMA DURU  
Plaintiff

v.

Civil Action No. \_\_\_\_\_

DR ROBERT SCHREINER, ET AL;  
Defendant

COMPLAINT

CONT; PLAINTIFF WAS EMPLOYED WITH KAISER PERMANENTE GEORGIA FROM APRIL 21, 2008, TILL APRIL 27, 2012. THE FOUR YEARS EMPLOYED AT KAISER PERMANENTE GEORGIA, WAS THE WORST YEARS OF MY LIFE. THROUGHOUT THIS FOUR YEAR PERIOD, DR ROBERT SCHREINER WAS THE EXECUTIVE MEDICAL DIRECTOR FOR HOSPITALS, DOCTORS, AND SPECIALTY

\* Attach additional pages as needed.

CARE.

CONT;

Date MARCH 21, 2016.  
Signature Rose Duru.  
Print Name ROSE ADANIMA DURU.  
Address 1822 YOUNG STREET,  
City, State, Zip DALLAS, TEXAS 75201.  
Telephone N/A



UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

8

ROSE ADANIMA DURU  
Plaintiff

v.

Civil Action No. \_\_\_\_\_

DR ROBERT SCARBINER, ET AL;  
Defendant

COMPLAINT

CONT; - PLAINTIFF NEVER MET, NOR EVER SPOKE TO DEFENDANT-DR ROBERT SCARBINER. THIS DEFENDANT TOOK CARE OF SOME PATIENTS AT NORTHSIDE HOSPITAL OF ATLANTA, INCLUDING SOME OF MY PATIENTS. DR ROBERT SCARBINER ONLY WORKED NIGHT SHIFTS AND WAS ALWAYS GONE BY 6:30AM. I READ DR ROBERT SCARBINER'S PROGRESS NOTES, AND, I AM VERY FAMILIAR WITH HIS HAND-WRITING.

\* Attach additional pages as needed.

Date MARCH 21, 2016.  
Signature Rose Duru.  
Print Name ROSE ADANIMA DURU.  
Address 1822 YOUNG STREET,  
City, State, Zip DALLAS, TEXAS 75201.  
Telephone N/A

CONT:



UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

9

ROSE ADANMA DURU  
Plaintiff

v.

Civil Action No. \_\_\_\_\_

DR ROBERT SCAREINER, ET AL;  
Defendant

COMPLAINT

CONT: PLAINTIFF PARTIED WAYS WITH KAISER PERMANENTE GEORGIA ON APRIL 27, 2012, BUT FOR SOME REASON, DR ROBERT SCAREINER HAS BEEN UNABLE TO MOVE ON WITH HIS MISERABLE LIFE. DR ROBERT SCAREINER'S OBSESSION FOR PLAINTIFF IS DEADLY. THIS MAD MAN HAS <sup>BEEN</sup> STALKING PLAINTIFF, HACKING INTO PLAINTIFF'S CELL PHONES, AND EMAIL ADDRESSES.

\* Attach additional pages as needed.

CONT:

Date MARCH 21, 2016.  
Signature Rose Duru.  
Print Name ROSE ADANMA DURU.  
Address 1822 TOUNG STREET,  
City, State, Zip DALLAS, TEXAS 75201.  
Telephone N/A

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

10

ROSE ADANMA DURU  
Plaintiff

v.

Civil Action No.

DR ROBERT SCARINER, ET AL,  
Defendant

COMPLAINT

CONT: DR ROBERT SCARINER'S SICK OBSESSION HAVE CAUSED PLAINTIFF FOUR YEARS OF UNEMPLOYMENT. PLAINTIFF IS CURRENTLY ON SOCIAL SECURITY DISABILITY FOR MAJOR DEPRESSION DUE TO THE ACTIONS OF DR ROBERT SCARINER, AND KAISER PERMANENTE GEORGIA, AND TSPMG-; "I BARELY ESCAPED WITH MY LIFE FROM GEORGIA!" DR ROBERT SCARINER IS A SICK MAN AND NEEDS PSYCHIATRIC HELP.

\* Attach additional pages as needed.

CONT:

Date MARCH 21, 2016.  
Signature Rose Duru.  
Print Name ROSE ADANMA DURU  
Address 1822 YOUNG STREET,  
City, State, Zip DALLAS, TEXAS 75201.  
Telephone N/A

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

(11)

ROSE ADANIMA DURU  
Plaintiff

v.

Civil Action No.

DR ROBERT SCHREINER, ET AL  
Defendant

COMPLAINT

CONT: PLAINTIFF CAN PROVE TO THE COURT THAT DR ROBERT SCHREINER HAS BEEN STALKING PLAINTIFF SINCE 2006/2007. PLAINTIFF HAS A PENDING CIVIL SUIT IN THE DALLAS COUNTY DISTRICT COURT, AGAINST DR ROBERT SCHREINER. DR ROBERT SCHREINER IS A LIAR; SICK; A THIEF; A STALKER; A PEEPING TOM; FRAUD; HE DESPERATELY NEEDS HELP, QUICKLY.

\* Attach additional pages as needed.

PLEASE EXHIBITS

Date

MARCH 21, 2016.

Signature

Rose Duru.

Print Name

ROSE ADANIMA DURU.

Address

1822 YOUNG STREET,

City, State, Zip

DALLAS, TEXAS 75201.

Telephone

N/A

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

(12)

ROSE ADANMA DURU  
Plaintiff

v.

Civil Action No. \_\_\_\_\_

DR ROBERT SCHREINER, ET AL,  
Defendant

COMPLAINT

DEFENDANT- HURON CONSULTING GROUP,  
OF DALLAS, TEXAS.

PLAINTIFF HOLDS THE ABOVE NAMED  
DEFENDANTS ACCOUNTABLE FOR HIDING  
THEIR EMPLOYEE, DR ROBERT SCHREINER'S  
CRIMINAL ACTIVITIES; COVER UP;  
ACCESSORY AFTER THE FACT; CONTINUED  
HARASSMENT; DEPRIVED INDIFFERENCE;  
OBSTRUCTION OF JUSTICE. HURON  
CONSULTING GROUP IS VERY AWARE OF

\* Attach additional pages as needed.

DR ROBERT SCHREINER'S  
DEADLY OBSESSION.

Date

MARCH 21, 2016.

CONT.

Signature

Rose Duru.

Print Name

ROSE ADANMA DURU.

Address

1822 YOUNG STREET,

City, State, Zip

DALLAS, TEXAS 75201.

Telephone

N/A

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

13

ROSE ADANMA DURU  
Plaintiff

v.

Civil Action No.

DR ROBERT SCHARNER, ET AL,  
Defendant

COMPLAINT

CONT: HURON CONSULTING GROUP;  
PLAINTIFF HOLDS THIS DEFENDANT VERY  
MUCH RESPONSIBLE, AND ACCOUNTABLE FOR  
THE ACTIONS OF THEIR EMPLOYEE - THE MAD  
MAN, DR ROBERT SCHARNER. HURON  
CONSULTING GROUP IS VERY AWARE OF  
THE CIVIL SUITS AGAINST DR ROBERT  
SCHARNER, AND THE CONTINUED  
DISCORD BETWEEN PLAINTIFF, AND THE

\* Attach additional pages as needed. EVIL DR ROBERT SCHARNER.

Date MARCH 21, 2016 CONT:  
Signature Rose Duru  
Print Name ROSE ADANMA DURU  
Address 1822 YOUNG STREET,  
City, State, Zip DALLAS, TEXAS 75201.  
Telephone N/A

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

(14)

Rose ADANMA Duru  
Plaintiff

v.

Civil Action No. \_\_\_\_\_

DR ROBERT SCHARNER ET AL,  
Defendant

COMPLAINT

CONT: PLAINTIFF RESPECTFULLY ASKS THE COURT TO AWARD PLAINTIFF \$26 MILLION DOLLARS IN DAMAGES AGAINST, DR ROBERT SCHARNER, AND \$26 MILLION DOLLARS AGAINST HURON CONSULTING GROUP; AND ADDITIONAL \$26 MILLION DOLLARS IN PUNITIVE DAMAGES AGAINST EACH DEFENDANT, FOR INTENTIONAL, AND MALICIOUS INFLECTION OF PHYSICAL PAIN, AND MENTAL ANGUISH, AND FOR BEING

\* Attach additional pages as needed.

PURE EVIL:

CONT:

Date MARCH 21, 2016.  
Signature Rose Duru  
Print Name ROSE ADANMA DURU  
Address 1822 Young STREET,  
City, State, Zip DALLAS, TEXAS 75201.  
Telephone N/A

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

(15)

ROSE ADANMA DURU  
Plaintiff

v.

Civil Action No. \_\_\_\_\_

DR ROBERT SCHREINER, ET AL.  
Defendant

COMPLAINT

DEFENDANTS: JANA S. BAKER;  
HEIDI H. HARRISON; AND OGLETREE,  
DEAKINS, NASH, SMOAK, & STEWART, P.C.  
COMPLAINTS / CLAIMS - OBSTRUCTION OF  
JUSTICE; ATTORNEYS MISCONDUCT;  
GROSS PROFESSIONAL NEGLIGENCE; DECEIT;  
CONSPIRACY TO EVADE PROSECUTION;  
PLAINTIFF HOLDS THE ABOVE NAMED  
DEFENDANTS RESPONSIBLE FOR THE  
DISMISSAL OF PLAINTIFF'S CIVIL SUITS -

\* Attach additional pages as needed.

CONT.

Date MARCH 21, 2016.  
Signature Rose Duru  
Print Name ROSE ADANMA DURU.  
Address 1822 YOUNG STREET,  
City, State, Zip DALLAS, TEXAS 75201.  
Telephone N/A



UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

16

ROSE ADANMA DURU  
Plaintiff

v.

Civil Action No. \_\_\_\_\_

DR ROBERT SCHREINER, ET AL.  
Defendant

COMPLAINT

CONT'S AGAINST DR ROBERT SCHREINER;  
CASE NO: 3-14-CV-03636; AND CASE  
NO: 3-14-CV-03817:

THESE ATTORNEYS SUPPORTED PERJURY,  
AND COVERED UP FOR THEIR CLIENT-  
DR ROBERT SCHREINER; THESE ATTORNEYS  
DECEIVED THE COURT; MISREPRESENTED  
THE TRUTH; LIED TO THE COURT; THESE  
ATTORNEYS WERE VERY MUCH AWARE  
THAT DR ROBERT SCHREINER LIVES RIGHT

\* Attach additional pages as needed.

HERE IN DALLAS, TEXAS.

Date MARCH 21, 2016.  
Signature Rose Duru.  
Print Name ROSE ADANMA DURU.  
Address 1822 YOUNG STREET,  
City, State, Zip DALLAS, TEXAS 75201.  
Telephone N/A

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

17

Rose ADANMA Duru.  
Plaintiff

v.

Civil Action No.

DR ROBERT SCHARINGER, ET AL,  
Defendant

COMPLAINT

CONT: PLAINTIFF HOLDS THESE ATTORNEYS  
PROFESSIONALLY LIABLE FOR FAILING TO DO  
DUE DILIGENCE; FAILING TO RESPECT THE  
COURT, AND FAILING TO RECOGNIZE THAT  
PERJURY IS A SERIOUS OFFENSE; FAILING  
TO APPEAR IN COURT AND PROPERLY DEFEND  
THEIR CLIENT - DR ROBERT SCHARINGER.  
PLAINTIFF PRAYS THAT THESE ATTORNEYS  
BE SANCTIONED, AND DISCIPLINED BY THE

\* Attach additional pages as needed.

COURT OF LAW:

CONT:

Date MARCH 21, 2016.  
Signature Rose Duru  
Print Name ROSE ADANMA DURU.  
Address 1822 YOUNG STREET,  
City, State, Zip DALLAS, TEXAS 75201.  
Telephone N/A

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

(18)

ROSE ADANMA DURU

Plaintiff

v.

Civil Action No.

DR ROBERT SCHREINER, ET AL,

Defendant

COMPLAINT

CONT: DUE TO THE ACTIONS OF THESE ATTORNEYS, PLAINTIFF HAS SUFFERED SEVERE EMOTIONAL TRAUMA, AND DISTRESS; SEVERE PAIN AND SUFFERING; PLAINTIFF HAS BEEN EXPERIENCING PHYSICAL PAIN AND MENTAL ANGUISH; FINANCIAL LOSS DUE TO COURT COSTS. PLAINTIFF SEEKS \$26 MILLION DOLLARS AGAINST EACH NAMED DEFENDANTS IN DAMAGES, AND ADDITIONAL \$26 million

\* Attach additional pages as needed. DOLLARS IN PUNITIVE DAMAGES AGAINST EACH DEFENDANT.

Date MARCH 21, 2016. SEE EXHIBITS  
Signature Rose Duru.  
Print Name ROSE ADANMA DURU.  
Address 1822 YOUNG STREET,  
City, State, Zip DALLAS, TEXAS 75201.  
Telephone N/A

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

19

Rose ADANMA DURU  
Plaintiff

v.

Civil Action No. \_\_\_\_\_

DR. ROBERT SCHAEFER, ET AL,  
Defendant

COMPLAINT

WHEREFORE, PLAINTIFF PRAYS THAT THE DEFENDANTS BE DULY CITED TO APPEAR AND ANSWER HEREIN; AND THAT UPON A FINAL TRIAL OF THIS CAUSE, PLAINTIFF RECOVER DAMAGES IN THE AMOUNT OF \$26 MILLION DOLLARS FROM EACH OF THE NAMED DEFENDANTS, AND ADDITIONAL \$26 MILLION DOLLARS IN PUNITIVE DAMAGES FOR BEING SO CORRUPT.

\* Attach additional pages as needed.

CONT.

Date MARCH 21, 2016  
Signature Rose Duru  
Print Name ROSE ADANMA DURU  
Address 1822 YOUNG STREET,  
City, State, Zip DALLAS, TEXAS 75201.  
Telephone N/A

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

(20)

ROSE ADANMA DUBU  
Plaintiff

v.

Civil Action No. \_\_\_\_\_

DR ROBERT SCHEINER, ET AL,  
Defendant

COMPLAINT

DAMAGES CONT: ① JUDGMENT AGAINST DEFENDANTS FOR PLAINTIFF'S DAMAGES AS SET FORTH, IN AN AMOUNT WITHIN THE JURISDICTIONAL LIMITS OF THIS COURT;  
② INTEREST ON THE JUDGMENT AT THE LEGAL RATE FROM DATE OF JUDGMENT;  
③ COSTS OF COURT; AND, ④ SUCH OTHER AND FURTHER RELIEF TO WHICH THE PLAINTIFF MAY BE ENTITLED.

\* Attach additional pages as needed.

Date MARCH 21, 2016.  
Signature Rose Dubu.  
Print Name ROSE ADANMA DUBU.  
Address 1822 YOUNG STREET,  
City, State, Zip DALLAS, TEXAS 75201.  
Telephone N/A

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

ROSE ADANMA DURU  
Plaintiff

v.

Civil Action No. \_\_\_\_\_

DR ROBERT SCHREINER, ET AL,  
Defendant

COMPLAINT

EXHIBIT A-I

ATTORNEYS, JANA S. BAKER, AND  
HEIDI H. HARRISON'S PURJURED,  
AND FALSE DECLARATION.

THEY BOTH WERE VERY MUCH  
AWARE THAT, DR ROBERT SCHREINER  
RESIDES RIGHT HERE IN DALLAS TX:

\* Attach additional pages as needed.

Date MARCH 21, 2016.  
Signature Rose Duru  
Print Name ROSE ADANMA DURU.  
Address 1822 YOUNG STREET,  
City, State, Zip DALLAS, TEXAS 75201.  
Telephone \_\_\_\_\_

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

ROSE ADANMA DURU

Plaintiff,

v.

DR. ROBERT SCHEINER, KERRY  
KOHLEN –PRESIDENT, and KAISER  
PERMANENTE GEORGIA

Defendants.

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CIVIL ACTION NO. 3:14-cv-3636-L

**APPENDIX TO DEFENDANTS DR. ROBERT SCHREINER, KERRY KOHNEN, AND  
“KAISER PERMANENTE GEORGIA”’s MOTION TO DISMISS PLAINTIFF’S  
COMPLAINT PURSUANT TO RULE 12(b)(2), (4)-(6) AND BRIEF IN SUPPORT**

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Defendants, Dr. Robert Schreiner, Kerry Kohnen and “Kaiser Permanente Georgia” file this Appendix to their Motion to Dismiss Plaintiff’s Complaint Pursuant to Rule 12(b)(2), (4)-(6) and Brief in Support, as follows:

Exhibit	Document	App.
A	Declaration of Craig Faerber	1-6
B	Declaration of Kerry Kohnen	7-13
C	Declaration of Robert Schreiner	14-19



Respectfully submitted,

/s/ Jana S. Baker

Jana S. Baker

Texas Bar No. 00794610

jana.baker@ogletreedeakins.com

Heidi H. Harrison

Texas Bar No. 24074370

heidi.harrison@ogletreedeakins.com

**OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.**

Preston Commons, Suite 500

8117 Preston Road

Dallas, Texas 75225

(214) 987-3800 (Telephone)

(214) 987-3927 (Facsimile)

**ATTORNEYS FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

This is to certify that on December 23, 2014, I electronically transmitted the foregoing document to the Clerk of Court using the ECF system of filing and sent a true and correct copy via certified mail, return receipt requested, to:

Rose A. Duru  
Plaintiff  
1822 Young Street  
Dallas, TX 75201

/s/ Jana S. Baker

Jana S. Baker

19866297.1

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

~~ROSE ADANMA DURU~~

Plaintiff,

v.

~~DR. ROBERT SCHREINER~~, KERRY  
KOHLEN – PRESIDENT, and KAISER  
PERMANENTE GEORGIA

Defendants.

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~~CIVIL ACTION NO. 3:14-cv-3636~~

~~DR. ROBERT SCHREINER~~

1. My name is Dr. Robert Schreiner, M.D. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration. The statements contained herein are true and are based on my own personal knowledge.

2. Although my name appears incorrectly in the cause style of the case, I am aware Plaintiff Rose Adanma Duru has filed a lawsuit against me. As indicated on the envelope, Ms. Duru sent copies of the Summons and Complaint via certified mail addressed to me at 3495 Piedmont Road, Atlanta, Georgia, 30305. A true and correct copy of the Summons and Complaint is attached hereto as Exhibit 1.

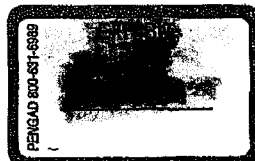
3. I do not live – nor have I ever lived – at 3495 Piedmont Road, Atlanta Georgia, 30305; that building is commercial office space. Instead, I reside in Dunwoody, Georgia.

4. I ~~understand~~ that Ms. Duru filed her lawsuit in the Northern District of Texas located in Dallas, Texas.

a. ~~I have never lived in Texas nor do I own or lease any property in Texas.~~

DECLARATION OF ROBERT SCHREINER

Page 1



App. 14

- b. I do not operate a business in Texas. Indeed, I am not an employer, have no employees in Texas (or anywhere else), and have never employed Ms. Duru in or outside of Texas.
- c. I do not pay taxes in Texas.
- d. I do not maintain a bank account in Texas.
- e. I do not have a telephone listing in Texas.
- f. I have visited Texas only once in the last several years, and this particular trip was for a reason completely unrelated to Ms. Duru or her lawsuit, as I currently understand her vague claims.

I declare under penalty of perjury that the foregoing is true and correct.

  
Dr. Robert Schreiner, M.D.

  
Date

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

ROSE ADANMA DURU

Plaintiff

v.

DR ROBERT SCHREINER

Defendant

Civil Action No. 3-14-CV-3636-L

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

DR ROBERT SCHREINER  
3495 PIEDMONT ROAD  
ATLANTA, GEORGIA 30305

A lawsuit has been filed against you.

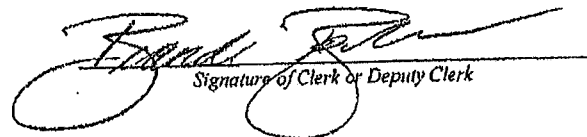
Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

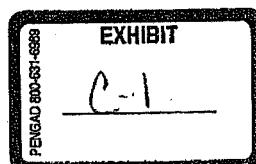
ROSE A. DURU  
PRO SE  
1822 YOUNG STREET  
DALLAS, TEXAS 75201

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: DEC 02 2014

  
Signature of Clerk or Deputy Clerk



UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

Dallas Division

2014 OCT -9 AM 11:43

DEPUTY CLERK NT

ROSE ADANNA DURU  
Plaintiff

v.

3-14-CV-0030-L  
Civil Action No.

DR. ROBERT SCHENK  
Defendant KERRY KAHNEN - PRESIDENT  
KASER BERMANENTE GEORGINA  
COMPLAINT

PLAINTIFF SEEKING DAMAGES ~~OF~~ IN THE  
AMOUNT OF \$100,000,000.00 FOR -  
UNLAWFUL TERMINATION; VERY HOSTILE  
WORKING ENVIRONMENT; DISCRIMINATION  
REGARDING PROMOTION; FALSE ACCUSATION  
SLANDER; BLACK-BILLED/BLACK LISTED IN  
THE STATE OF GEORGIA AND COLORADO.  
BLOCK MY EFFORTS TO APPLY FOR JOBS  
THROUGH "CORP WORKS".  
PLAINTIFF PRAYS THAT THE DEFENDANTS BE DULY CITED  
TO APPEAR AND ANSWER HEREIN; AND THAT UPON A FINAL TRIAL  
\* Attach additional pages as needed. OF THIS CAUSE, PLAINTIFF RECOVERS.

Date

Signature

Print Name

Address

City, State, Zip

Telephone

[Signature]  
ROSE A. DURU  
1822 YOUNG STREET  
DALLAS, TEXAS 75201  
214-994-6358

Document 3 PageID 6

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

Dallas Division

ROSE ADAMIA DUN  
Plaintiff

v.

Civil Action No.

~~DR. ROBERT SCHEIDT~~  
Defendant KASER PERMANENTE GA

COMPLAINT

WHEREFORE, PLAINTIFF PRAYS THAT THE DEFENDANTS  
BE DULY CITED TO APPEAR AND ANSWER  
HEREIN; AND THAT UPON FINAL TRIAL OF CAUSE,  
PLAINTIFF RECOVER: ① Judgment against  
DEFENDANTS for PLAINTIFF'S DAMAGES as set  
forth above, in an amount within the jurisdiction  
limits of this court; Interest on the judgment  
at legal rate from date of judgment;  
Cost of Court; and Such other and further  
relief to which PLAINTIFF may be entitled.

\* Attach additional pages as needed.

KASER PERMANENTE GEORGIA  
DERAILED CAREER AND RUINED  
MY LIFE!!

Date

Signature

Print Name

Address

City, State, Zip

Telephone

03/21/16  
Rose Dun  
Rose Dun  
1822 YOUNG STREET  
DALLAS, TEXAS 75201  
214-994-6358



Case 3:14-cv-03636-L Document 3 Page 21 of 21 PageID 7

JS 44 (Rev. 09/11)

# CIVIL COVER SHEET **3-14CV3636-L**

The JS 44 civil coversheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

<b>I. (a) PLAINTIFFS</b> <b>ROSE ADANMA DURU</b>		<b>DEFENDANTS</b> <b>KATIE BERNARD GAY</b>	
<b>(b) County of Residence of First Listed Plaintiff</b> DALLAS, TX (EXCEPT IN U.S. PLAINTIFF CASES) 1822 YOUNG STREET DALLAS, TX 75201		<b>County of Residence of First Listed Defendant</b> FULTON, GA (IN U.S. PLAINTIFF CASES ONLY) NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED. ML KERRY FULTON ATTORNEYS (If Known) 3495 PIEDMONT BLVD ATLANTA, GA 30305	
<b>(c) Attorneys (Firm Name, Address, and Telephone Number)</b> SELF REPRESENTATION			

<b>II. BASIS OF JURISDICTION</b> (Place an "X" in One Box Only)		<b>III. CITIZENSHIP OF PRINCIPAL PARTIES</b> (Place an "X" in One Box for Plaintiff and One Box for Defendant)	
<input type="checkbox"/> 1 U.S. Government Plaintiff	<input type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)	<input checked="" type="checkbox"/> 1 DEF Incorporated or Principal Place of Business in This State	<input type="checkbox"/> 4 DEF
<input type="checkbox"/> 2 U.S. Government Defendant	<input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	<input type="checkbox"/> 2 DEF Incorporated and Principal Place of Business in Another State	<input checked="" type="checkbox"/> 5 DEF
		<input type="checkbox"/> 3 DEF Foreign Nation	<input type="checkbox"/> 6 DEF

<b>IV. NATURE OF SUIT</b> (Place an "X" in One Box Only)					
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 365 Personal Injury - Med. Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 191 Empl. Ret. Inv. Security Act	<input type="checkbox"/> 422 Appeal 28 USC 138 <input type="checkbox"/> 423 Withdrawal 28 USC 137 <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 450 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes

<b>V. ORIGIN</b> (Place an "X" in One Box Only)	<input checked="" type="checkbox"/> 1 Original Proceeding <input type="checkbox"/> 2 Removed from State Court <input type="checkbox"/> 3 Remanded from Appellate Court <input type="checkbox"/> 4 Reinstated or Reopened <input type="checkbox"/> 5 Transferred from another district (Specify) <input type="checkbox"/> 6 Multidistrict Litigation
---	--

<b>VI. CAUSE OF ACTION</b> Brief description of cause: Accusation of Unlawful Termination	Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
---	--

<b>VII. REQUESTED IN COMPLAINT:</b>	<input type="checkbox"/> CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23	DEMAND \$ _____ CHECK YES only if demanded in complaint: JURY DEMAND: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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<b>VIII. RELATED CASE(S) PENDING OR CLOSED:</b> (See Instructions)	JUDGE _____ DATE _____ SIGNATURE OF ATTORNEY OF RECORD _____ FOR OFFICE USE ONLY	DOCKET NUMBER _____ RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____
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## Huron Consulting Group Expands Huron Healthcare with Physician Executive and Population Health Management Expert

~~Former Executive Medical Director for Kaiser Permanente Georgia Joins Huron Healthcare~~

CHICAGO—(BUSINESS WIRE)—Apr. 8, 2014—Huron Consulting Group (NASDAQ: HURN), a leading provider of business consulting services, today announced that Rob Schreiner, M.D., has joined its Huron Healthcare practice as a managing director. Dr. Schreiner will focus on helping hospitals and health systems with population health management, coordinated care across the continuum, and effective hospital-physician alignment.

"Redesigning care delivery is at the heart of health reform. To successfully manage populations while improving quality, safety and costs, hospitals and their aligned clinicians must fundamentally change the way care is delivered," said Andy Ziskind, M.D., managing director and Clinical solutions leader, Huron Healthcare. "Rob has deep experience, both as a physician and a Kaiser Permanente leader. He brings a strong track record of creating integrated healthcare that results in more effective and efficient clinical outcomes."

Dr. Schreiner, a pulmonologist and critical care specialist, brings more than 25 years of physician leadership and executive experience to Huron Healthcare's Clinical solutions team. Most recently he served as executive medical director for Kaiser Permanente Georgia, where he held several executive and clinical management positions throughout his 20-year career, including chief operating officer, associate medical director for hospital, specialty and ancillary care, and chief of medical hospitalist services and pulmonary critical care services.

Dr. Schreiner earned a bachelor's of science in chemistry and attended medical school at the University of Tennessee. He completed his residency at Vanderbilt University Medical School, where he served as chief resident and then went on to complete a fellowship for pulmonary and critical care at Colorado Health Sciences Center. Dr. Schreiner is active in professional and civic groups, including serving as chairman of the Medical Association of Atlanta and secretary of the Medical Association of Georgia.

### About Huron Healthcare

Huron Healthcare is the premier provider of performance improvement and clinical transformation solutions for hospitals and health systems. By partnering with clients, Huron delivers solutions that improve quality, increase revenue, reduce expenses, and enhance physician, patient, and employee satisfaction across the healthcare enterprise. Clients include leading national and regional integrated healthcare systems, academic medical centers, community hospitals and physician practices. *Modern Healthcare* ranked Huron Healthcare third on its 2013 list of the largest healthcare management consulting firms. Learn more at [www.huronconsultinggroup.com/healthcare](http://www.huronconsultinggroup.com/healthcare) or follow us on Twitter: @Huron.

### About Huron Consulting Group

Huron Consulting Group helps clients in diverse industries improve performance, transform the enterprise, reduce costs, leverage technology, process and review large amounts of complex data, address regulatory changes, recover from distress and stimulate growth. Our professionals employ their expertise in finance, operations, strategy and technology to provide our clients with specialized analyses and customized advice and solutions that are tailored to address each client's particular challenges and opportunities to deliver sustainable and measurable results. The Company provides consulting services to a wide variety of both financially sound and distressed organizations, including healthcare organizations, leading academic institutions, Fortune 500 companies, governmental entities and law firms. Huron has worked with more than 425 health systems, hospitals, and academic medical centers; more than 400 corporate general counsel; and more than 350 universities and research institutions. Learn more at [www.huronconsultinggroup.com](http://www.huronconsultinggroup.com).



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F:(617) 226-5555

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4 Cambridge Center  
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F:(617) 252-4699

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F:(704) 697-1402

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UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

ROSE ADANMA DURU  
Plaintiff

v.

Civil Action No. \_\_\_\_\_

DR ROBERT SCHREINER, ET AL  
Defendant

COMPLAINT

EXHIBIT A - II

PLAINTIFF IS VERY FAMILIAR WITH THE HANDWRITING OF DR ROBERT SCHREINER. PLAINTIFF READ ENOUGH OF DR ROBERT SCHREINER'S PROGRESS NOTES, TO KNOW THAT HE FRAUDULENTLY SIGNED DR REED PITRE'S DECLARATION: DR ROBERT SCHREINER IMPERSONATED DR REED PITRE. PLEASE COMPARE BOTH SIGNATURES:

\* Attach additional pages as needed.

Date MARCH 21, 2016.  
Signature Rose Duru  
Print Name ROSE ADANMA DURU  
Address 1822 YOUNG STREET,  
City, State, Zip DALLAS, TEXAS 75201  
Telephone \_\_\_\_\_

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

ROSE ADANMA DURU

Plaintiff,

**V.**

NO. 3:14-cv-03817N-BN

TSPMG KAISER PERMANENTE  
GEORGIA, KAISER FAMILY  
FOUNDATION GEORGIA, DR ROBERT  
SCHREINER, DR PITRIE, DR ENRIQUE  
GALURA, KERRY KOHNEN,  
PRESIDENT, KAISER PERMANENT  
GEORGIA, DR CARVER, and DR  
JEFFREY KLOPPER, ATLANTA  
BEHAVIORAL GROUP,

**Defendants.**

**APPENDIX TO  
DEFENDANTS TSPMG, DR. ROBERT SCHREINER, DR. REED  
PITRE, KERRY KOHNEN, DR. LAWRENCE CARVER, AND  
DR. JEFFREY KLOPPER'S MOTION TO DISMISS PLAINTIFF'S  
COMPLAINT PURSUANT TO RULE 12(b)(2), (5)-(6)**

Defendants, TSPMG, Dr. Robert Schreiner, Dr. Reed Pitre, Kerry Kohnen, Dr. Lawrence Carver, and Dr. Jeffrey Klopper file this Appendix to their Motion to Dismiss Plaintiff's Complaint Pursuant to Rule 12(b)(2), (4)-(6) and Brief in Support, as follows:

<b>Exhibit</b>	<b>Document</b>	<b>App.</b>
A	Declaration of Michael F. Doherty, M.D.	1 – 5
B	Declaration of Robert Schreiner	6 – 11
C	Declaration of Reed Pitre	12 – 17
D	Declaration of Kerry Kohnen	18 – 25
E	Declaration of Lawrence Carver	26 – 31

Exhibit	Document	App.
F	Declaration of Jeffrey Klopfer	32 – 37

Respectfully submitted,

/s/ Jana S. Baker

Jana S. Baker

Texas Bar No. 00794610

[jana.baker@ogletreedeakins.com](mailto:jana.baker@ogletreedeakins.com)

Heidi H. Harrison

Texas Bar No. 24074370

[heidi.harrison@ogletreedeakins.com](mailto:heidi.harrison@ogletreedeakins.com)

**OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.**

Preston Commons, Suite 500

8117 Preston Road

Dallas, Texas 75225

(214) 987-3800 (Telephone)

(214) 987-3927 (Facsimile)

**ATTORNEYS FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

This is to certify that on January 28, 2015, I electronically transmitted the foregoing document to the Clerk of Court using the ECF system of filing and sent a true and correct copy via certified mail, return receipt requested, to:

Rose A. Duru  
Plaintiff  
1822 Young Street  
Dallas, TX 75201

/s/ Jana S. Baker

Jana S. Baker

20170064.1

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

**RECEIVED**

Plaintiff,

**v.**

TSPMG KAISER PERMANENTE  
GEORGIA, KAISER FAMILY  
FOUNDATION GEORGIA, [REDACTED]  
[REDACTED] DR ENRIQUE  
GALURA, KERRY KOHNEN,  
PRESIDENT, KAISER PERMANENT  
GEORGIA, DR CARVER, and DR  
JEFFREY KLOPPER, ATLANTA  
BEHAVIORAL GROUP,

**Defendants.**

1. My name is Dr. Robert Schreiner, M.D. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration. The statements contained herein are true and are based on my own personal knowledge.

2. I am aware Plaintiff Rose Adanma Duru has filed a lawsuit against me. As indicated on the envelope, Ms. Duru sent copies of the Summons and Complaint via certified mail addressed to me at 3495 Piedmont Road, Atlanta, Georgia, 30305. A true and correct copy of the Summons and Complaint is attached hereto as Exhibit 1.

3. I do not live - nor have I ever lived - at 3495 Piedmont Road, Atlanta Georgia, 30305; that building is commercial office space. Instead, I reside in Dunwoody, Georgia.

4. I understand that Mrs. Duru filed her lawsuit in the Northern District of Texas located in Dallas, Texas.

a. I have never lived in Texas nor do I own or lease any property in Texas.

### DECLARATION OF ROBERT SCHREINER

**EXHIBIT**

Page 1



- b. I do not operate a business in Texas. I am not an employer and have no employees in Texas (or anywhere else).
- c. I do not pay taxes in Texas.
- d. I do not maintain a bank account in Texas.
- e. I do not have a telephone listing in Texas.
- f. I have visited Texas three times in the last several years for personal reasons, and those trips were for a reason completely unrelated to Ms. Duru or her lawsuit.

5. Further, and although Ms. Duru's claims are vague and it is unclear against whom she contends certain causes of action, I generally understand that she alleges "medical malpractice."

- a. I am licensed to practice medicine in the state of Georgia not Texas.
- b. I have never advertised my medical services to individuals residing in the state of Texas or solicited business from them.
- c. I have never provided medical treatment to Ms. Duru in the state of Texas. Indeed, I have never referred Ms. Duru to receive medical treatment in the state of Texas or forwarded prescriptions for Ms. Duru to obtain medication in the state of Texas.
- d. Likewise, I have not administered to the medical needs of other patients in Texas.

I declare under penalty of perjury that the foregoing is true and correct.

  
D.  D.

  
Date 

Case 3:14-cv-03817-N-BN Document 9 Filed 12/17/14 Page 13 of 16 PageID 35

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the  
Northern District of Texas

Rose Adanma Duru

Plaintiff

v.

TSPMG Kaiser Permanente Georgia, et

al

Defendant

Civil Action No. 3:14-cv-03817-N-BN

Summons in a Civil Action

TO: Robert Schreiner, Kaiser Permanente Georgia

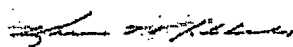
A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) -- or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12(a)(2) or (3) -- you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or the plaintiff's attorney, whose name and address are:

Rose Adanma Duru (pro se)  
1822 Young St.  
Dallas, TX 75201

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

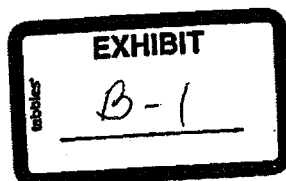
CLERK OF COURT



Signature of Clerk or Deputy Clerk



DATE: 12/17/2014



Case 3:14-cv-03817-N-BN Document 9 Filed 12/17/14 Page 14 of 16 PageID 36

AO 440 (Rev. 12/09) Summons in a Civil Action (Page 2)

Civil Action No. 3:14-cv-03817-N-BN

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (f))*

This summons for (name of individual and title, if any) \_\_\_\_\_  
was received by me on (date) \_\_\_\_\_.

☐ I personally served the summons on the individual at (place) \_\_\_\_\_  
\_\_\_\_\_ on (date) \_\_\_\_\_; or

☐ I left the summons at the individual's residence or usual place of abode with (name) \_\_\_\_\_  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on (date) \_\_\_\_\_, and mailed a copy to the individual's last known address; or

☐ I served the summons on (name of individual) \_\_\_\_\_, who is designated  
by law to accept service of process on behalf of (name of organization) \_\_\_\_\_  
\_\_\_\_\_ on (date) \_\_\_\_\_; or

☐ I returned the summons unexecuted because \_\_\_\_\_; or

☐ other (specify) \_\_\_\_\_  
\_\_\_\_\_

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
Server's signature

\_\_\_\_\_  
Printed name and title

\_\_\_\_\_  
Server's address

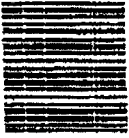
Additional information regarding attempted service, etc:



Rose Abbott-Dana  
1890 1/2 Sand Street  
Dallas, Texas 75201



7014 2120 0000 8852 4258



1000

30305

REQUESTED

DR ROBERT SCHAUBNER  
Kaiser Permanente Georgia  
31415 Piedmont Road  
Atlanta, Georgia 30305



IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

**ROSE ADANMA DURU**

Plaintiff,

v.

TSPMG KAISER PERMANENTE  
GEORGIA, KAISER FAMILY  
FOUNDATION GEORGIA, DR  
SCHULZ, DR ENRIQUE  
GALURA, KERRY KOHNEN,  
PRESIDENT, KAISER PERMANENT  
GEORGIA, DR CARVER, and DR  
JEFFREY KLOPPER, ATLANTA  
BEHAVIORAL GROUP,

Defendants.

NO. 16-cv-00219

1. My name is Dr. Reed Pitre, M.D. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration. The statements contained herein are true and are based on my own personal knowledge.

2. Although Plaintiff Rose Adanma Duru failed to provide a first name for "DR PITRIE" and spelled my last name incorrectly, I believe she has filed a lawsuit against me. As indicated on the envelope, Ms. Duru sent copies of the Summons and Complaint via certified mail addressed to a "DR PITRIE" at 3495 Piedmont Road, Atlanta, Georgia, 30305. A true and correct copy of the Summons and Complaint is attached hereto as Exhibit 1.

3. Although I currently reside in Atlanta, Georgia, I do not live -- nor have I ever lived -- at 3495 Piedmont Road, Atlanta Georgia, 30305; that building is commercial office space.

DECLARATION OF REED PITRE



Page 1

App. 12

4. I understand that Ms. Duru filed her lawsuit in the Northern District of Texas located in Dallas, Texas.

- a. I have never lived in Texas nor do I own or lease any property in Texas.
- b. I do not operate a business in Texas. I am not an employer and have no employees in Texas (or anywhere else).
- c. I do not pay taxes in Texas.
- d. I do not maintain a bank account in Texas.
- e. I do not have a telephone listing in Texas.
- f. I have not visited Texas in well over a decade, and that particular trip was for a reason completely unrelated to Ms. Duru or her lawsuit, as I currently understand her vague claims.

5. Further, and although Ms. Duru's claims are vague and it is unclear against whom she contends certain causes of action, I generally understand that she alleges "medical malpractice."

- a. I am licensed to practice medicine in the state of Georgia not Texas.
- b. I have never advertised my medical services to individuals residing in the state of Texas or solicited business from them.
- c. I have never provided medical treatment to Ms. Duru in the state of Texas. Indeed, I have never referred Ms. Duru to receive medical treatment in the state of Texas or forwarded prescriptions for Ms. Duru to obtain medication in the state of Texas.
- d. Likewise, I have not administered to the medical needs of other patients in Texas.



I declare under penalty of perjury that the foregoing is true and correct.

  
Date

Case 3:14-cv-03817-N-BN Document 9 Filed 12/17/14 Page 11 of 16 PageID 33

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the  
Northern District of Texas

Rose Adanma Duru

Plaintiff

v.

TSPMG Kaiser Permanente Georgia, et

al

Defendant

Civil Action No. 3:14-cv-03817-N-BN

Summons in a Civil Action

TO: NFN Pitrie, Kaiser Permanent Georgia

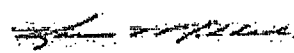
A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) -- or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12(a)(2) or (3) -- you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or the plaintiff's attorney, whose name and address are:

Rose Adanma Duru (pro se)  
1822 Young St.  
Dallas, TX 75201

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

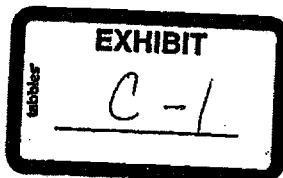
CLERK OF COURT



Signature of Clerk or Deputy Clerk



DATE: 12/17/2014



Case 3:14-cv-03817-N-BN Document 9 Filed 12/17/14 Page 12 of 16 PageID 34

AO 440 (Rev. 12/09) Summons in a Civil Action (Page 2)

Civil Action No. 3:14-cv-03817-N-BN

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (f))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_.

☐ I personally served the summons on the individual at *(place)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* \_\_\_\_\_, who is designated  
by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I returned the summons unexecuted because \_\_\_\_\_; or

☐ other *(specify)* \_\_\_\_\_  
\_\_\_\_\_

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
Server's signature

\_\_\_\_\_  
Printed name and title

\_\_\_\_\_  
Server's address

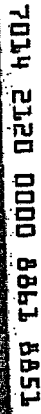
Additional information regarding attempted service, etc:



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**EXPENSE**

KILPAT (2201-44 30305  
 2201-44 30305



DEC 11 1961  
App. 17



UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

ROSE ADANMA DURU.  
Plaintiff

v.

Civil Action No. \_\_\_\_\_

DR ROBERT SCHREINER, ET AL,  
Defendant

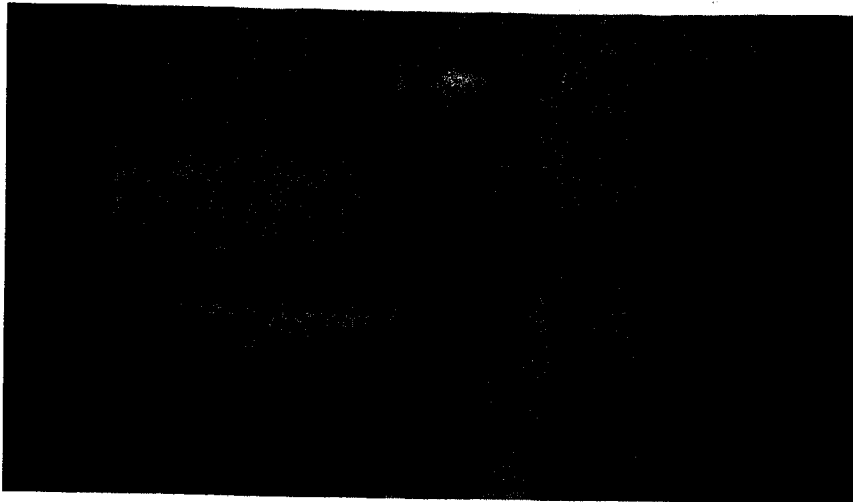
COMPLAINT

EXHIBIT A-III

THIS EXHIBIT SHOWS THAT THIS  
DEFENDANT-DR ROBERT SCHREINER,  
HAS BEEN AWARE OF THIS PLAINTIFF,  
AND HAS BEEN "PATHETIC", AND  
"PITIFULLY" OBSESSED, AND HAS BEEN  
STALKING PLAINTIFF FOR ALMOST  
TEN YEARS. "NOW THAT'S SICKENING!"

\* Attach additional pages as needed.

Date MARCH 21, 2016.  
Signature Rose Duru.  
Print Name ROSE ADANMA DURU  
Address 1822 YOUNG STREET,  
City, State, Zip DALLAS, TEXAS 75201.  
Telephone \_\_\_\_\_



Dr. Rob Schreiner - Kaiser Permanente, EarthShare of Georgia 2013



**Southeast Green - SEGreen Mobile**

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Published on Apr 19, 2013

EarthShare of Georgia hosted it's annual Earth Day Leadership Breakfast on April 19th. Hosting the who's who of Environmental Non-Profits, Atlanta's Corporate Sustainability Leaders and the Atlanta Sustainability Community, the breakfast announced it's annual award winners and featured Bruce Karas of Coca-Cola as the keynote speaker.

SHOW MORE

## ALL COMMENTS

Add a public comment...

No comments to display

PLAINTIFF HAS NEVER MET THIS MAN!!!

WHILE PLAINTIFF WAS EMPLOYED  
AT KAISER PERMANENTE GEORGIA  
DR ROBERT SCHAEINER WAS THE  
EXECUTIVE MEDICAL DIRECTOR  
FOR, HOSPITALS, SPECIALTY CARE  
AND DOCTORS AT KAISER  
PERMANENTE GEORGIA.

PLAINTIFF DOES NOT KNOW WHY  
THIS MAN IS STALKING PLAINTIFF  
ACROSS STATE LINE.

<https://www.youtube.com/watch?v=hGZ5E5Ba1uY>

8/28/2015

**ORKIN 1-800-GO-ORKIN**  
click for the Orkin Man

**PEST CONTROL  
DOWN TO  
A SCIENCE.®**

Up next

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**Roy Willis, Propane Education & Research Council**  
by Southeast Green - SEGreen Mobile  
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**What do you do to reduce your lifestyle? | Full of Useless**  
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**Recycling | Full of Useless Information**  
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**Communities In Schools featured on The CW's Focus Atlanta**  
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About 8,870 results

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Past hour  
Past 24 hours  
Past week  
Past month  
Past year

All results  
Verbatim

**About Rob Schreiner, MD | Leadership in Health Care**[www.drrobschreiner.com/aboutrob/](http://www.drrobschreiner.com/aboutrob/)

Rob has 25 years of healthcare leadership experience, including 10 years as a ... Prior to joining Huron Healthcare, Rob served Kaiser Permanente Georgia ...

**Farewell, KP | Leadership in Health Care**[www.drrobschreiner.com/innovation/farewell-kp/](http://www.drrobschreiner.com/innovation/farewell-kp/)

Home · About Dr. Schreiner · Health Care Quality · Medical Leadership · Environmental Awareness ... Posted on March 10, 2014 by Rob Schreiner. At the end of this month, following 20 years of service, I will leave Kaiser Permanente. ... My decision to leave has nothing to do with our business in the Georgia Region.

**Executive Medical Director, Kaiser Permanente of Georgia**[www.hip.emory.edu/resources/faculty/schreiner\\_robert.html](http://www.hip.emory.edu/resources/faculty/schreiner_robert.html)

Kaiser Permanente of Georgia. Email: Rob.Schreiner@kp.org · Link to Profile ». Dr. Schreiner has served as the Executive Medical Director for The Southeast ...

**Dr. Rob Schreiner Says NO MORE - Kaiser Permanente**[share.kaiserpermanente.org/article/dr-rob-schreiner-says-no-more/](http://share.kaiserpermanente.org/article/dr-rob-schreiner-says-no-more/)

Dr. Rob Schreiner is the Executive Medical Director for The Southeast ... you today as a physician in Atlanta, as a leader of healthcare in Georgia, and as a ...

**Rob Schreiner, MD, FACP, FCCP | LinkedIn**<https://www.linkedin.com/pub/rob-schreiner-md-facp-fccp/13/5ab/244>

Greater Atlanta Area · Managing Director at Huron Consulting Group  
View Rob Schreiner, MD, FACP, FCCP's professional profile on LinkedIn. ... Waldrep, and the current Association President Dr. Perry-Gilkes, lead the largest county medical society in Georgia, current membership 1400. ... Kaiser Permanente.

**Dr. Robert Schreiner, MD - Atlanta, GA - Critical Care Medicine ...**[www.healthgrades.com/physician/dr-robert-schreiner-36496](http://www.healthgrades.com/physician/dr-robert-schreiner-36496)

Rating: 1 - 1 vote

Visit Healthgrades for information on Dr. Robert Schreiner, MD. ... Permanente Glenlake: Kaiser Permanente Glenlake: 20 Glenlake Pkwy: Atlanta, GA 30328.

**Dr. Rob Schreiner Elected President of The Medical Association of ...**[tspm.com/index.php/about/news-and.../147-schreinermaa2012](http://tspm.com/index.php/about/news-and.../147-schreinermaa2012)

Kaiser Permanente of Georgia Heart Failure University ... Dr. Rob Schreiner, Executive Medical Director for The Southeast Permanente Medical Group, Elected ...

**The Southeast Permanente Medical Group, Inc.**[tspm.com/](http://tspm.com/)

Founded in Atlanta in 1985, The Southeast Permanente Medical Group (TSPMG) is one of the largest multi-specialty medical groups in Georgia. ... Richard Ellin, MD · Earl Thurmond, MD Robert Cohen, MD ... Kaiser Permanente members partner with their physician to make informed decisions and take the right steps to ...

**Schreiner joins Huron Consulting as managing director of healthcare**[www.modernhealthcare.com/article/20140407/NEWS/304079933](http://www.modernhealthcare.com/article/20140407/NEWS/304079933)

Apr 7, 2014 ... Dr. Rob Schreiner, formerly executive medical director for Kaiser Permanente Georgia, is joining Huron Consulting Group as managing director ...

**Dr. Rob Schreiner - Kaiser Permanente, EarthShare of Georgia 2013**[www.youtube.com/watch?v=hGZ5E5Ba1uY](http://www.youtube.com/watch?v=hGZ5E5Ba1uY)

Apr 19, 2013 · 3 min · Uploaded by Southeast Green - SEGreen Mobile  
EarthShare of Georgia hosted it's annual Earth Day Leadership Breakfast on April 19th ...

**Kaiser Permanente Doctors**Ad [kaiser-permanente.findsmarter.com/](http://kaiser-permanente.findsmarter.com/)

Find Kaiser Permanente Fast: Get Results from Multiple Engines!

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PLAINTIFF LEFT  
THE STATE OF  
GEORGIA ON  
MARCH 1, 2014,  
AND MOVED TO  
HOUSTON, TEXAS, THEN  
DALLAS, TEXAS.  
DR ROBERT SCHREINER  
FOLLOWED LIKE A  
PUPPY DOGS





April 14, 2008

Rose Duru  
1500 Terrill Mill Road  
Apt. 5-C  
Marietta, Georgia 30067

Dear Rose:

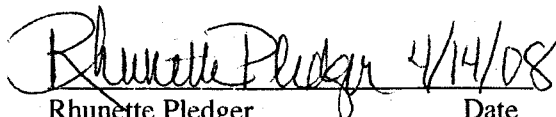
The Southeast Permanente Medical Group, Inc. is very pleased that you are interested in joining our team. This letter is our offer of employment for the position of **Onsite Inpatient Care Coordinator** located at **Northside Hospital** effective **April 21, 2008**. This position is full time with an annualized base salary of **\$63,454.63**. There is a three month probationary period beginning on your first day of employment. Your immediate supervisor is **Evelyn Hines-Forbes, Supervisor, Onsite Inpatient Care Coordinators**.

The Southeast Permanente Medical Group, Inc. is committed to providing a safe and productive working environment. Therefore, if you accept this offer of employment, you will be required to complete a drug screen and a blood work screen (demonstrate standard immunizations) within 36 hours of receipt of this written offer. Instructions on completing these are included in this packet. In addition, employees in the Kaiser organization are required to have an annual tuberculosis skin test.

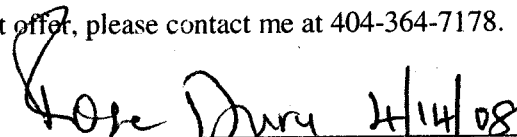
You are eligible to participate in our benefits program starting on your first day of employment. Information concerning benefits and other employee information will be reviewed with you during our Comprehensive Employee Orientation Program. You are scheduled for orientation on **Monday, April 21, 2008 at 8:30am; 5495 Piedmont Road, Northside Center, Building Eleven, 6<sup>th</sup> Floor, Conference Room B (The Learning Room)**.

You are also eligible to receive a **\$5,000.00** stipend subject to the terms of the attached agreement. If the terms of this offer are acceptable, please sign this offer letter and the attached Bonus Payment Agreement letter and return them to the office of Professional Recruitment in the enclosed DHL envelope and retain copies for your files. Please complete enclosed employment forms and bring them with you to Orientation. In addition, information regarding your identity and employment eligibility must be provided and copied within the first 3 days of employment. If you are a Registered Nurse or Licensed Clinical Social Worker, a copy of your license must also be provided.

If you have any questions regarding the employment offer, please contact me at 404-364-7178.

  
Rhunette Pledger  
Professional Recruiter

Date

  
Rose Duru  
Date

Kaiser Foundation Health Plan of Georgia requires background, credit, drug, and reference information on all new hires; therefore, this offer is contingent upon successful completion of these processes. It is also contingent upon your ability to provide appropriate identification pursuant to the requirements of the Federal Immigration Reform & Control Act. If this employment offer is accepted it will create an at-will employment relationship, which may be ended by either party, at any time, and for any reason. All terms of employment with Kaiser Foundation Health Plan of Georgia are governed by the Human Resources Policies and Procedures and may be subject to change at the discretion of Kaiser Permanente.

**KAISER PERMANENTE** **PERMANENTE MEDICAL GROUP**  
404-365-0966

Georgia Region **O. Foster-Peyton, MD** HMO

**ROSE DURU**  
MEMBER NAME  
**1446509**  
HEALTH RECORD NUMBER

**00002-900**  
GROUP NUMBER

**10/15** KP  
**16/21** Network  
GENERIC/  
BRAND RX

**15/20** PRI/SPEC  
VISIT **15** URGENT **75** EMERGENCY

**-/-** DEDUCT/  
RX DEDUCT **-** COINSUR

Copay

Deductible/  
Coinsurance

**KAISER PERMANENTE** **PERMANENTE MEDICAL GROUP**  
APPOINTMENTS: 404-365-0966

Georgia Region HMO

**ROSE DURU**  
MEMBER NAME  
**1446509**  
HEALTH RECORD NUMBER

**00002-106**  
GROUP NUMBER

**10/15** KP  
**20/25** Network  
GENERIC/  
BRAND RX

**15/20** PRI/SPEC  
VISIT **15** URGENT **75** EMERGENCY

**-/-** DEDUCT/  
RX DEDUCT **-** COINSUR

Copay

Deductible/  
Coinsurance

RX BIN No: 003585  
RX PCN No: 70000



**Kaiser Permanente**  
The Southeast Permanente Medical Group

**SUPPORT STAFF  
2012 COBRA ELECTION FORM**

**THIS FORM MUST BE COMPLETED AND RETURNED REGARDLESS OF COBRA ELECTION**

Date of COBRA Notice: 5/4/12 Employee's Hire Date: 7/4/08

Check Plan enrolled in at time of qualifying event: ☐ HMO High ☐ HMO New Hire  
☐ HMO Mid ☐ Multi Choice  
☒ HMO Low

(Check below all coverage in effect at time of qualifying event)

Qualified Beneficiary(ies)	SSN#	HMO	MC	Supp Medical	Supp Mental	Dental
Employee <u>Rose Duru</u>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Spouse/DP						
Child						
Child						
Child						
Child						

**ELECTING COBRA CONTINUATION COVERAGE**

You have the right to elect COBRA Continuation Coverage, which is the same coverage you had on the date of your qualifying event, under the Plan. Monthly premiums are subject to change if the premiums for the Plan are changed, or if you extend coverage beyond the 36-month period due to disability. Premiums are not prorated and refunds are not made in the event your COBRA Continuation Coverage ends prior to the last day of the calendar month.

**NOTE:** Only those dependents that had coverage on the day before the date of the qualifying event are eligible to elect COBRA Continuation Coverage. However, if you elect COBRA Continuation Coverage and then acquire, by birth or adoption, a new child, you may then change your coverage status to add that new child. An election for one dependent is binding on all dependents unless a separate Election Form is submitted to TSPMG Human Resources for each independent election. Any coverage that is paid for in part or in whole by the Company after the qualifying event will count against the maximum COBRA Continuation Coverage period.

Due to your, resignation your eligibility under the group health plan terminated on 5/31/12 You may,  
(Qualifying Event) (Date)  
 however, continue your coverage for 18 months from 6/1/12 to 11/30/13 (unless it ends sooner)  
(#Months) (Start Date) (End Date)

due to the Company ceasing to provide any group health plan or to your (i) coverage by another group health plan that does not contain a pre-existing condition exclusion that applies to you, (ii) coverage by Medicare, (iii) failure to make a timely monthly payment, or (iv) failure to notify this plan of any change in disability status (if your coverage has been extended due to disability). To continue your coverage, complete and return this election form no later than 60 days from the later of (1) the date of your COBRA notification letter, or (2) the date you would lose coverage due to your qualifying event. If you do not return this election form within this 60-day period, you will lose your right to elect continuation coverage.

**COBRA ELECTION** (Please check *One* only)

- ☐ I elect COBRA Continuation Coverage.
- ☐ I do not wish to elect COBRA Continuation Coverage.

Signature \_\_\_\_\_

Print Name \_\_\_\_\_

Date \_\_\_\_\_

HCArewards.com  
BConnected: (800) 566-4114

BConnected Representatives are available Monday through Friday, 7 a.m. to 7 p.m., Central time (except holidays).

CELL PHONE-678-600-6604.  
THIS CELL PHONE WAS HACKED  
AND BLOCKED BY  
DR ROBERT SCHARNER.  
RIGHT HERE IN DALLAS, TEXAS.

HC10183400041701010000



**YAHOO! MAIL**


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Drafts  
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Trash (3)

FOLDERS  
MESSENGER



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For a copy of the governing documents, go to [www.allinonemgmt.com/communities.htm](http://www.allinonemgmt.com/communities.htm) and scroll down to you

*If this communication involves a debt then the following statement applies: This is an attempt to collect a debt obtained will be used for that purpose. This e-mail may contain information that is privileged, confidential and under applicable law. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of any information from this e-mail is strictly prohibited. If you receive this notify me immediately.*

**Jeanne Deubel**  
Office Manager / Customer Service  
**All-In-One Community Management, Inc.**  
5200 Dallas Highway, Suite 200 #266  
Powder Springs, GA 30127  
TEL: 678.363.6479 / FAX: 678.363.6481  
[ideubel@allinonemgmt.com](mailto:ideubel@allinonemgmt.com)  
[www.allinonemgmt.com](http://www.allinonemgmt.com)

**From:** Rose Duru [<mailto:dururose777@yahoo.com>]  
**Sent:** Wednesday, April 10, 2013 4:49 AM  
**To:** Duffy Realty; hjohnson; All In One Mgmt Jeanne; contractsatduffyrealty; AJC J Dena Humphries; All In One Mgmt Lynn; Atlanta Dental Specialists  
**Subject:** webarchiver

<http://upvcfencing.co.uk/dsmet-118.php>

PLAINTIFF DID NOT SEND THIS  
EMAIL TO THE ABOVE RECIPIENTS;  
DR ROBERT SCARFNER HACKED,  
AND TOOK OVER MY YAHOO  
EMAIL ADDRESS: